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SUPERIOR COURT  
OF GUAM

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By: 

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Attorneys for the People of Guam

**IN THE SUPERIOR COURT OF GUAM  
HAGATNA, GUAM**

PEOPLE OF GUAM,

vs.

**KASNO SAM,**  
DOB: 06/07/1980

Defendant.

Criminal Case No. CM **0398-21**  
GPD Report No. 21-25713

Charge:

**CHILD ABUSE**  
(As a Misdemeanor)

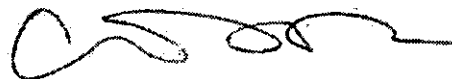
**MAGISTRATE'S COMPLAINT**

The Attorney General of Guam hereby accuses **KASNO SAM** of a certain crime committed as follows:

On or about the 19<sup>th</sup> day of October, 2021, in Guam, **KASNO SAM** did commit the offense of *Child Abuse (As a Misdemeanor)*, in that while having a child, *namely: A.D. (DOB: 01/08/2013)*, in his care or custody or under his control, he unreasonably caused or permitted the physical or emotional health of said child to be endangered, in violation of 9 GCA § 31.30(a)(2)(C), as amended.

Dated this day, Thursday, October 21, 2021.

**OFFICE OF THE ATTORNEY GENERAL**  
LEEVIN TAITANO CAMACHO, Attorney General of Guam



ALYSA DRAPER-DEHART  
For

**RENAIDA Z. SAN NICOLAS**  
Assistant Attorney General, Prosecution Division

C.RIMINAL

**IN THE SUPERIOR COURT OF GUAM**

**DECLARATION**

I, **RENAIDA Z. SAN NICOLAS**, a duly appointed Assistant Attorney General, aver upon information and belief that the following declaration is true. I have reviewed Guam Police Report 21-25713 submitted by Guam Police Officers which revealed the following occurred in Guam:

On or about October 19, 2021, at approximately 1:49 p.m., Officers met with Meryleah Pervez ("Pervez") at school in Tamuning regarding the welfare of a student, A.D. ("Victim")(d.o.b. 01/08/2013).

Earlier that day, Pervez noticed that the Victim had been sleeping in class and when asked about the reasons why, the Victim stated that he had taken his sister's cellphone without her permission and that when his mother found out, he had been spanked by a hanger and a knife, he was then told to face the wall for hours and was not given food to eat. When the Victim had gone to sleep that night, his father **KASNO SAM** ("Defendant") had woken him up and told the Victim to place his hands out in front of the Defendant. The Defendant then held what appeared to be a knife that appeared to be black and square in shape. The Defendant was observed to strike the Victim's hands at least two (2) times, which resulted in a small cut to the Victim's left hand. The Defendant then walked out the room.

**K.D.** (d.o.b. 08/09/2011), the Victim's sibling, was in the room at that time and had observed the interaction between the Victim and the Defendant.

A black colored square shaped knife was later located in the residence and confiscated.

Defendant was advised of her rights, which she acknowledged and waived. The Defendant denied using a knife on the Victim and did not know why the Victim would say he had hurt him.

Based on the foregoing, there is probable cause to charge **KASNO SAM** with:

1. **CHILD ABUSE** (as a Misdemeanor), *involving A.D.*, in violation of 9 G.C.A. §31.30(a)(2)(C).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 21<sup>st</sup> day of October, 2021.



**RENAIDA Z. SAN NICOLAS**